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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 ZEIDY M. PONCE CONEJO, )  
13 Plaintiff, ) CIVIL NO. 2:14-cv-01557-MMD-PAL  
14 vs. )  
15 CAROLYN W. COLVIN, Acting Commissioner )  
16 Of Social Security, ) DEFENDANT'S UNOPPOSED  
17 Defendant. ) MOTION TO EXTEND TIME TO  
18 ) RESPOND TO PLAINTIFF'S  
19 ) MEMORANDUM IN SUPPORT OF  
20 ) RELIEF REQUESTED IN  
21 ) PLAINTIFF'S COMPLAINT  
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CAROLYN W. COLVIN, Acting Commissioner Of Social Security (Defendant) hereby moves this Honorable Court to grant her unopposed motion for a 14-day extension of time to file her response and/or cross-motion to Zeidy M. Ponce Conejo's (Plaintiff) Memorandum In Support Of Relief Requested In Plaintiff's Complaint (the Motion) (Docket No. 18). This is the first extension of time requested in the above-captioned matter. Defense counsel requests this additional time because she inadvertently incorrectly calendared the date for Defendant to respond to the Motion and requires additional time to adequately address the issues Plaintiff raises in the Motion. Defense counsel apologizes for any inconvenience. The current deadline is May 11, 2015. The new deadline will be

MOTION FOR EXTENSION & PROPOSED ORDER (CASE NO. 2:14-cv-01557-MMD-PAL)

1 May 25, 2015. Any reply thereto will be due June 15, 2015. The parties have further agreed that the  
2 Court's Scheduling Order shall be modified accordingly.

3 Respectfully submitted,

4 Dated: May 12, 2015

5 DANIEL G. BOGDEN  
6 United States Attorney

7 By: /s/ Sharon Lahey  
8 SHARON LAHEY  
9 ASSISTANT REGIONAL COUNSEL

10 **ORDER**

11 PURSUANT TO STIPULATION, IT IS SO ORDERED. DEFENDANT SHALL FILE HER  
12 RESPONSE TO PLAINTIFF'S MEMORANDUM IN SUPPORT OF RELIEF REQUESTED IN  
13 PLAINTIFF'S COMPLAINT ON OR BEFORE MAY 25, 2015. ANY REPLY THERETO SHALL BE  
14 FILED ON OR BEFORE JUNE 15, 2015.

15 Dated: May 18, 2015

16   
17 HON. PEGGY A. LEEN  
18 UNITED STATES MAGISTRATE JUDGE

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28 MOTION FOR EXTENSION & PROPOSED ORDER (CASE No. 2:14-cv-01557-MMD-PAL)

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10 Attorneys for DEFENDANT

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 ZEIDY M. PONCE CONEJO, ) CIVIL NO. 2:14-cv-01557-MMD-PAL  
14 Plaintiff, )  
15 vs. )  
16 CAROLYN W. COLVIN, Acting Commissioner )  
17 Of Social Security, )  
18 Defendant. )

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19 I, Sharon Lahey, Assistant Regional Counsel, hereby certify that the following individual  
20 was served a copy of the foregoing **DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME**  
**TO RESPOND TO PLAINTIFF'S MEMORANDUM IN SUPPORT OF RELIEF REQUESTED**  
**IN PLAINTIFF'S COMPLAINT** on May 12, 2015:

22 CM/ECF:

23 Marc V. Kalagian, Esq.  
24 Rohlwing & Kalagian, LLP  
25 211 East Ocean Boulevard, Suite 420  
Long Beach, California 90802  
E-mail: rohlwing.kalagian@rksslaw.com

27 Dated this 12th day of May 2015

*/s/ Sharon Lahey*  
SHARON LAHEY  
Assistant Regional Counsel